



Bell Atlantic Pre-Filing

→ Bell Atlantic Pre-filing - 271 “Roadmap” of 4/6/98:

- Limited availability of “UNE-P” (full combination):
 - Residential customers: 4 yrs with no “glue charge” in major cities zone and 6 yrs with no “glue charge” in all other areas
 - Business POTS customers: 4 yrs with \$6 monthly “glue charge” in major cities zones and 6 yrs with \$2 monthly “glue charge” for all other areas
- Transition to Resale Pricing after duration period
- Collocation:
 - BA to allow CLECs to do combining through smaller collo cages; shared collo cages; and virtual collos
 - BA will demonstrate feasibility of non-cage collocation



BA- Cont.

- Concentration equipment for less than UNE-P:
 - Obligates BA to provide, where technically feasible, concentration equipment: no specific reference to GR303

➔ Precludes widespread, ubiquitous service throughout state:

- Negative impact on residential local market

➔ Investment unjustified with geographic and time limitations (e.g. OSS: preorder, order, maintenance and repair, billing; product development)

➔ Resale is unviable SDM



Other Combinations: GR303

→ Concentration Capability

→ Efficient and economic means to access unbundled loops:

- Eliminates need for collocation
- Technically feasible: ILECs use DLC in own networks

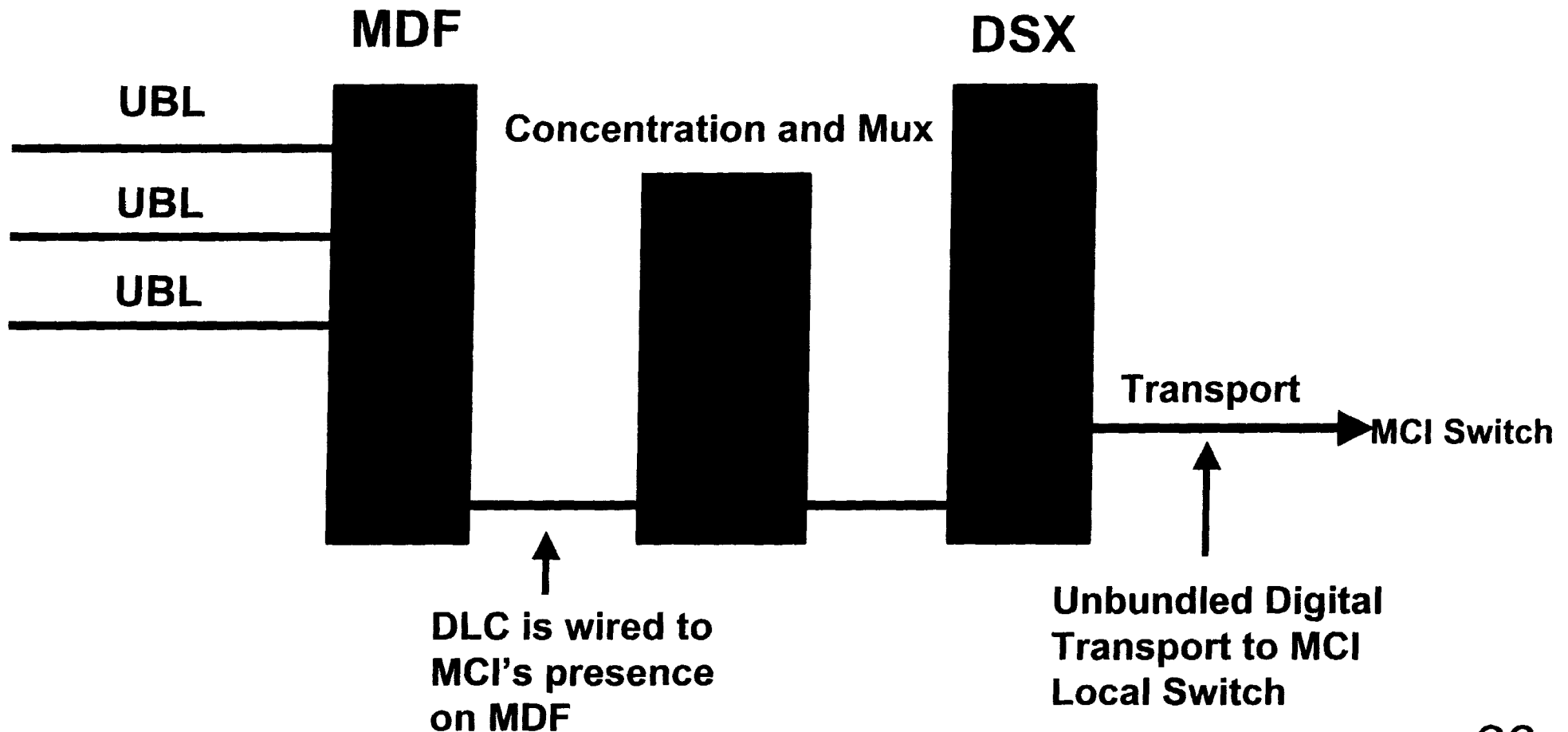
→ MCI would lease:

- Local loop
- Digital loop carrier equipment with GR303 capability
- Interoffice transport from end office to point on MCI's local network

→ BOC would combine these elements for MCI and combination would occur in BOC central office



GR303 Digital Loop Carrier





GR303 - Cont.

→ Legal Basis for GR303:

- CLECs are entitled to network facilities and elements in the same manner and to the same extent that the ILEC provides (or could provide) such facilities and elements to itself.
- Failure to provide industry standard concentration technology at cost-based rates is discriminatory treatment in violation of the Act



GR303 - Cont.

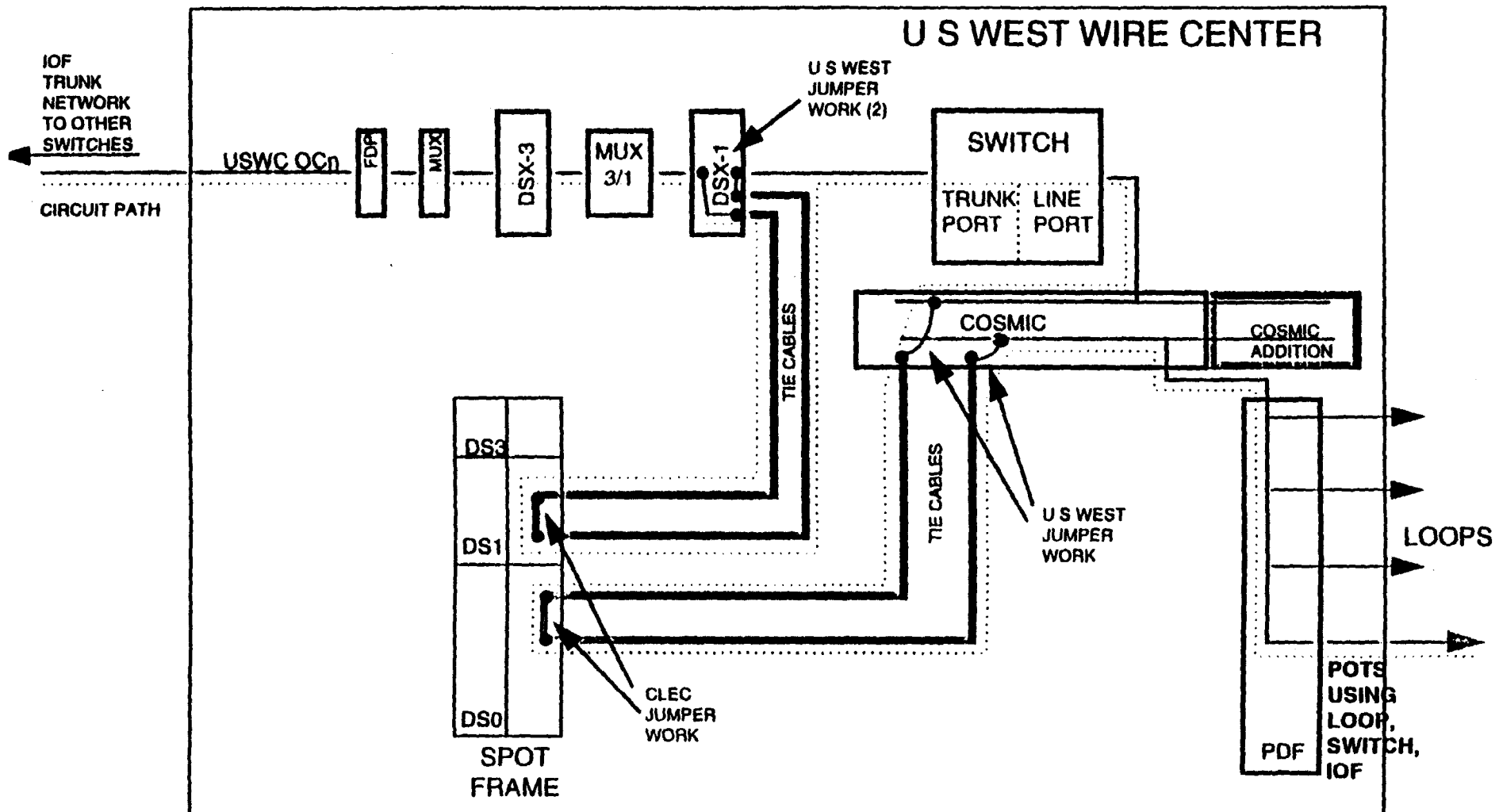
→ Public Interest:

- It is in the public interest for the FCC to require ILECs to deploy cost-effective, industry standard solutions to allow combinations.
- Availability of such a solution to access combinations promotes facilities-based local competition.

CLEC ELEMENT CONNECTIONS

SPOT FRAME

SERVICE: CLEC LOCAL EXCHANGE SERVICE - NO CLEC EQUIPMENT (UNE: LOOP, SWITCH, DS1 IOF)

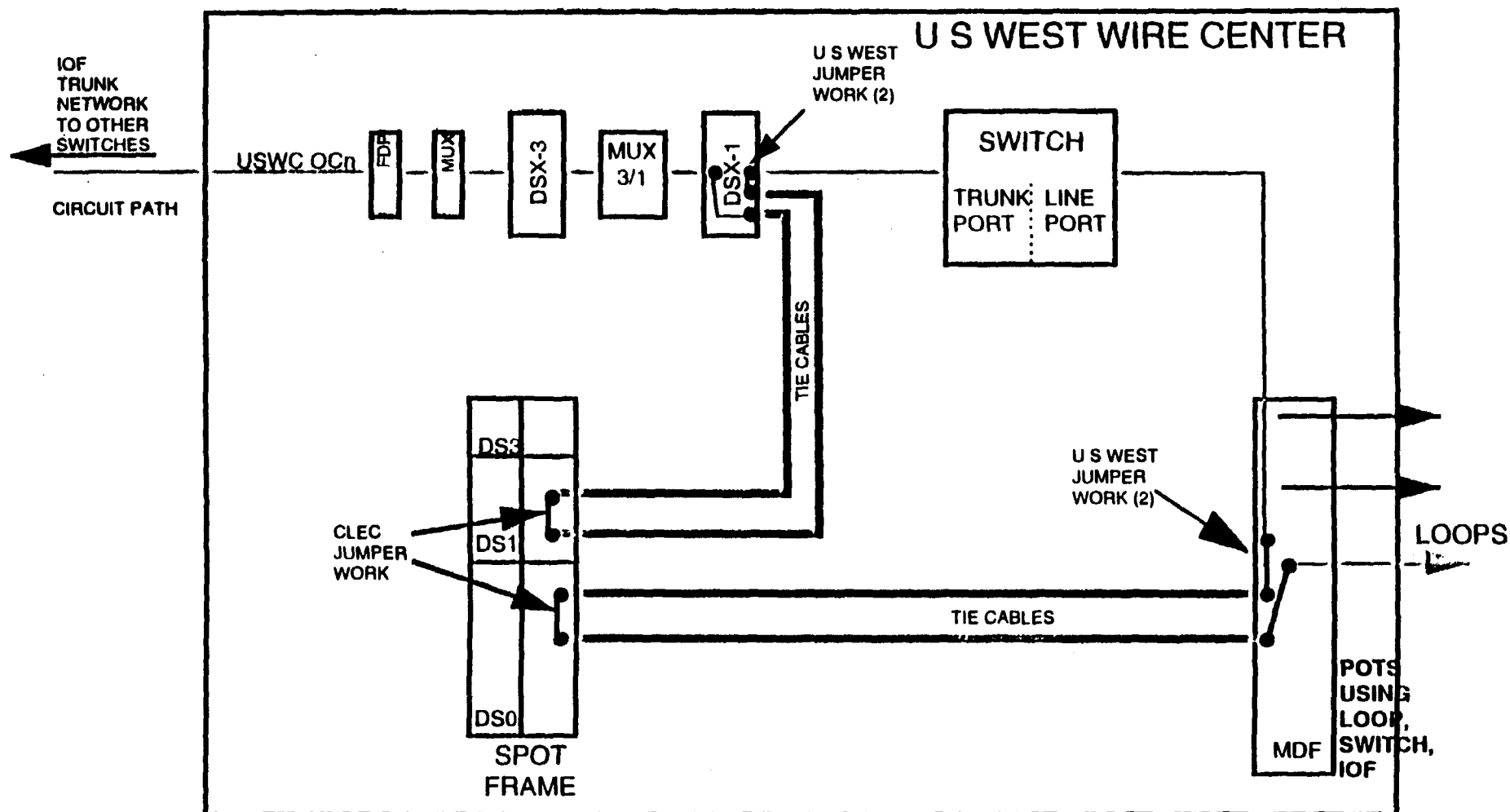


NOTE: THESE DRAWINGS ARE ONLY INTENDED TO BE REPRESENTATIVE AND NOT DEPICT EVERY CONFIGURATION POSSIBLE.

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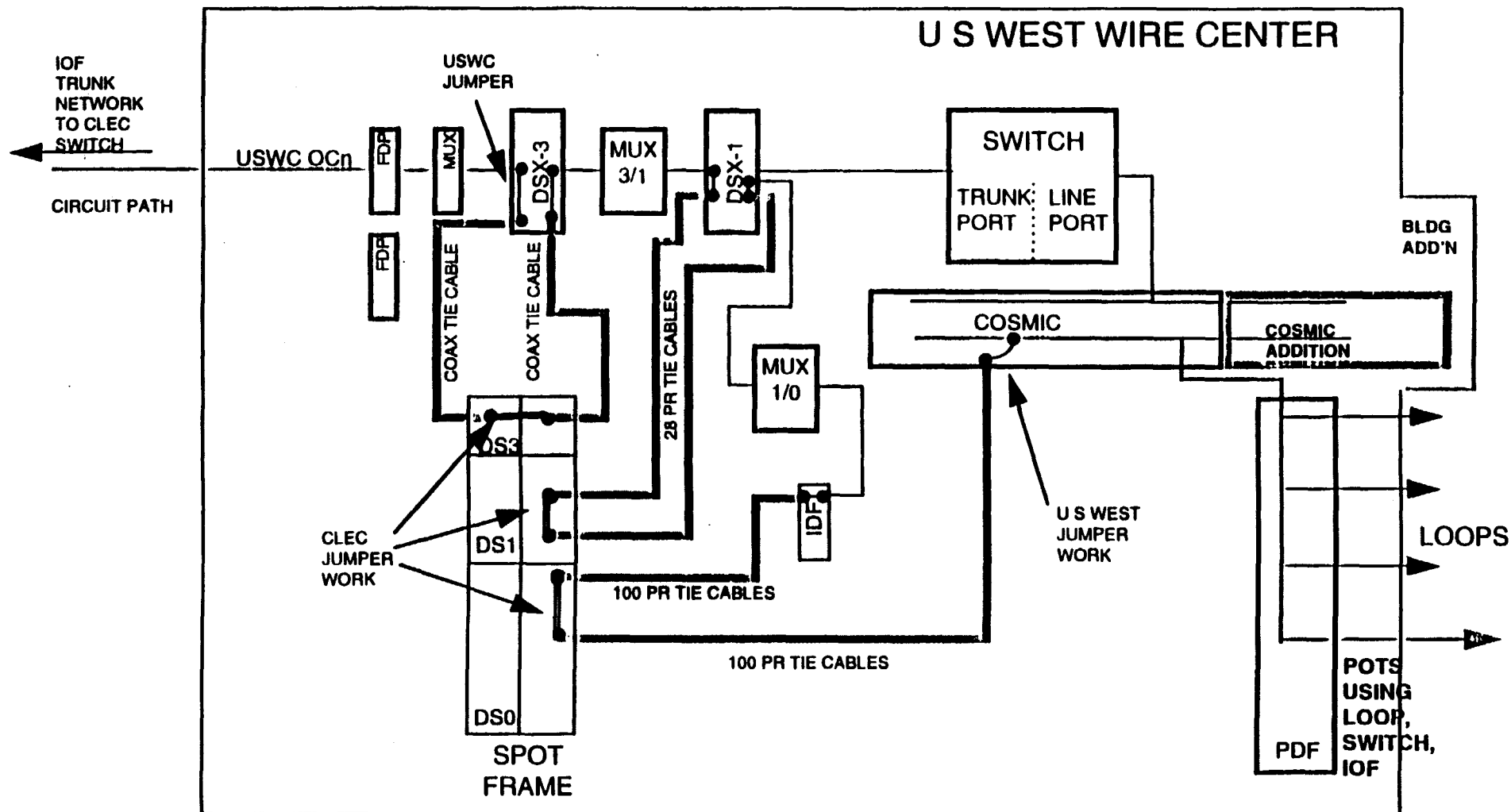


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CLEC ELEMENT CONNECTIONS

SPOT FRAME

SERVICE: CLEC LOCAL EXCHANGE SERVICE - CLEC PROVIDES SWITCH AND PURCHASES LOOP, MUX, DEDICATED IOF

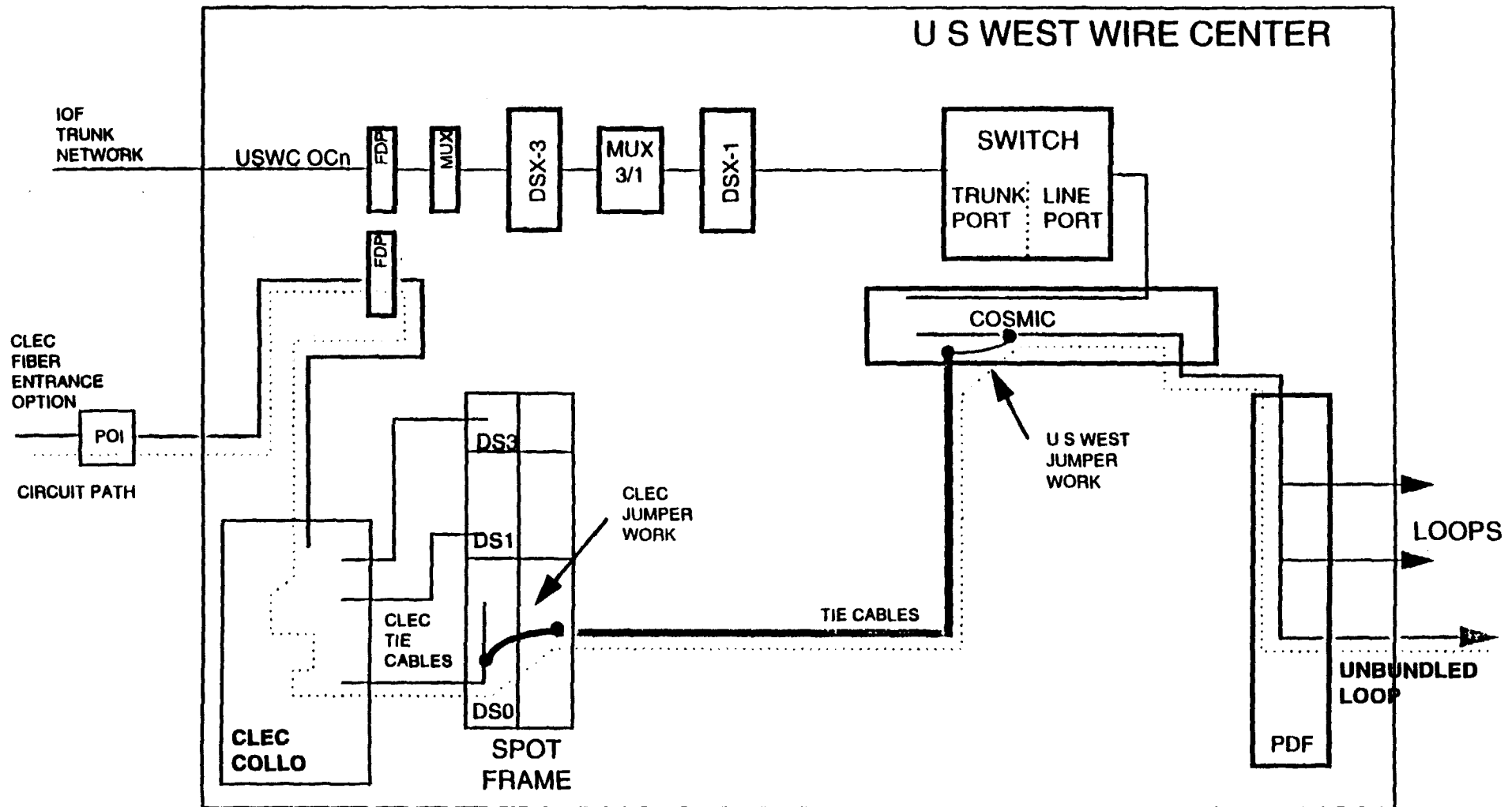


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CLEC ELEMENT CONNECTIONS

SPOT FRAME WITH COLLOCATION

SERVICE: CLEC LOCAL EXCHANGE SERVICE - CLEC PROVIDES SWITCH, IOF, MUX AND PURCHASES UNBUNDLED LOOP

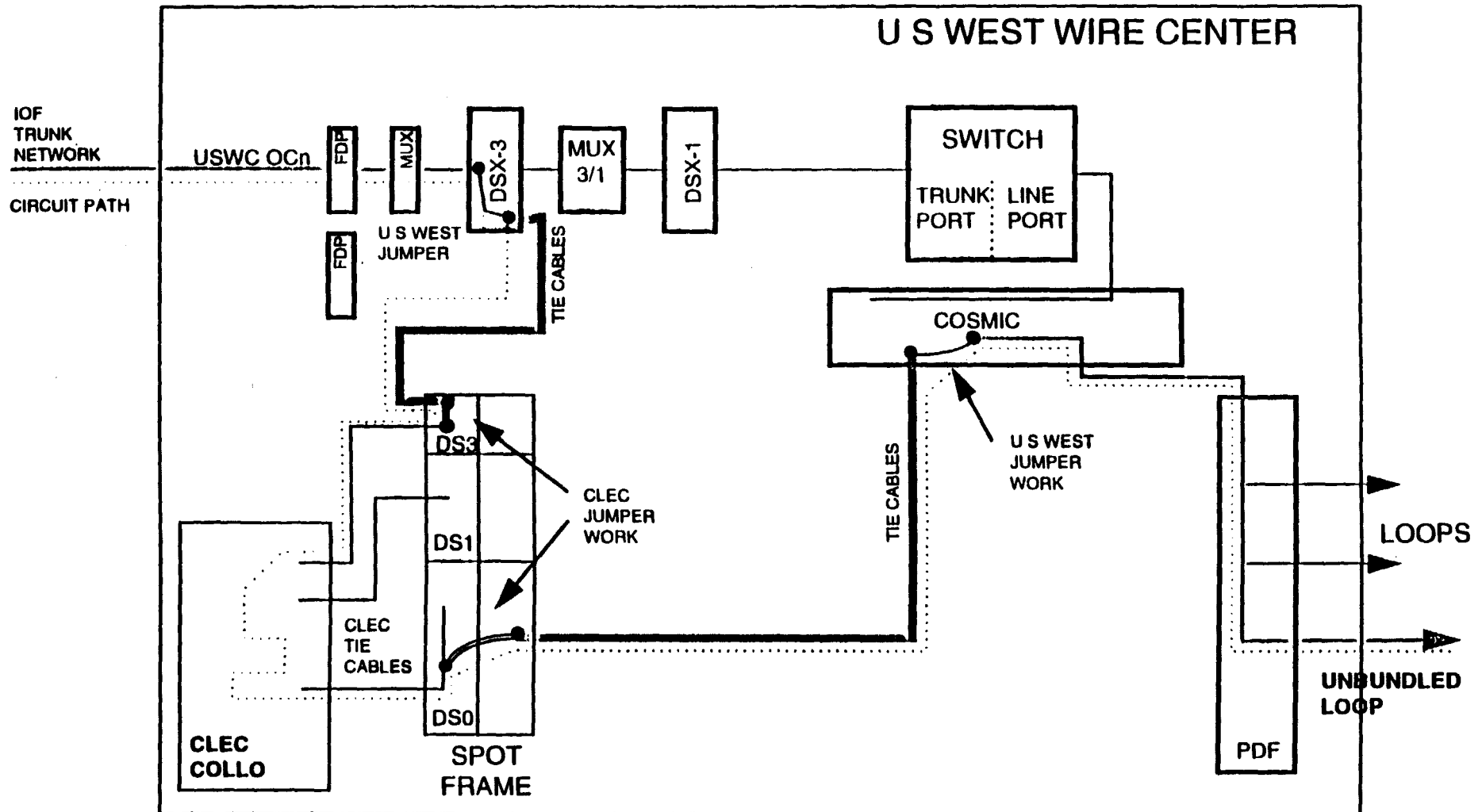


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CLEC ELEMENT CONNECTIONS

SPOT FRAME WITH COLLOCATION

SERVICE: CLEC LOCAL EXCHANGE SERVICE - CLEC PROVIDES SWITCH AND MUX AND PURCHASES IOF AND UNBUNDLED LOOP

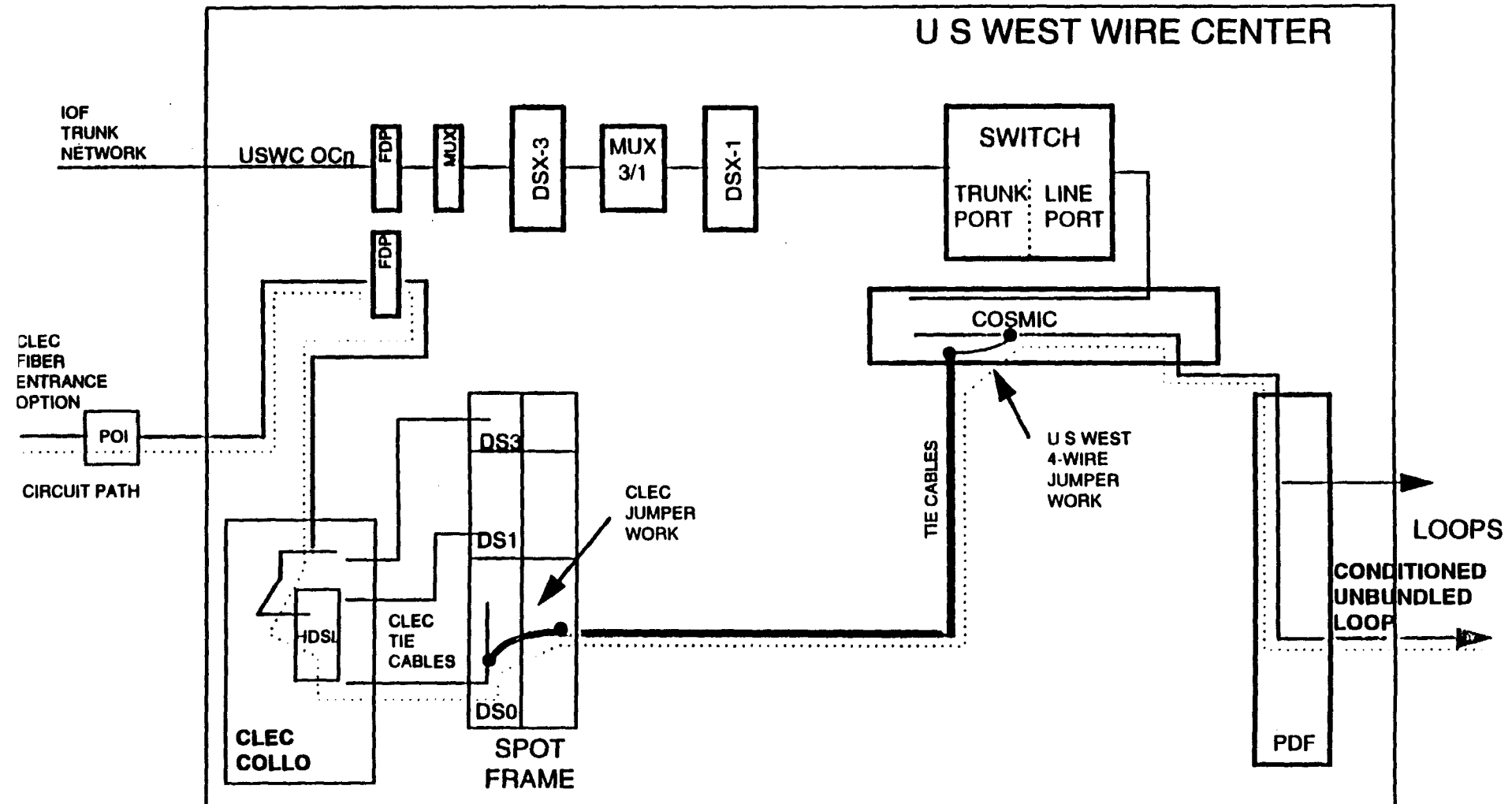


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CLEC ELEMENT CONNECTIONS

SPOT FRAME WITH COLLOCATION

SERVICE: CLEC DS1 - CLEC PROVIDES IOF AND HDSL EQUIPMENT AND PURCHASES HDSL CAPABLE UNBUNDLED LOOP



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